

U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

September 16, 2016

BY ECF AND BY EMAIL

Honorable Robert W. Sweet United States District Judge Southern District of New York 500 Pearl Street, Chambers 1940 New York, New York 10007

Email: Tsz_Man_Chan@nysd.uscourts.gov

Re: <u>United States</u> v. <u>Ryan Knights, et al.</u>,

13 Cr. 795 (RWS)

Dear Judge Sweet:

cc:

The Government writes in response to defense counsel's letter, filed September 15, 2016, requesting an adjournment of the trial in the above-captioned case, which Your Honor so ordered yesterday. Dkt. 66. As defense counsel notes, the Government consents to an adjournment of the trial until December 5, 2016. The Government objects, however, to an adjournment of the trial until late January 2017, as alternatively proposed by defense counsel. By way of clarification, although the Government has notified defense counsel that it plans to re-produce previously produced discovery with Bates stamps to assist counsel's preparation for trial, the Government submits that its courtesy in that regard does not warrant a three-month adjournment. Similarly, the superseding indictment that the Government intends to file involves no additional discovery. Against that backdrop, the Government respectfully asks that Your Honor clarify your order of yesterday and set trial to begin on or near December 5, 2016.

Respectfully submitted,

PREET BHARARA United States Attorney

Bv:

Elizabeth A. Hanft

Assistant United States Attorney

(212) 637-2334

Susan J. Walsh, Esq. (by ECF and by email)